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March 17, 2015

## **VIA EMAIL**

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Re: In re: Lehman Brothers Holdings Inc., et al.,

Debtors in Case No. 08-13555 (collectively "Lehman")

As to: Order Establishing a Protocol to Resolve Claims Filed by Trustees of Certain

Residential Mortgage-Backed Securities dated December 29, 2014 (the "Protocol

Order")

## Dear Gentlemen:

We write to request an update on the status of the RMBS Trustees' efforts to collect loan files from the master and primary mortgage loan servicers (including Nationstar Mortgage LLC ("Nationstar") and Wells Fargo Bank, National Association ("Wells Fargo"), and others).

Lehman is aware that the RMBS Trustees have been engaged in a number of efforts to comply with the Protocol Order and would like to know where the loan file collection stands to date, including whether the master and primary servicers are timely complying with the requests and the time frames under which the RMBS Trustees expect to receive files from the master and primary servicers. As the RMBS Trustees are no doubt aware, the RMBS Trustees' and the servicers' collective diligence with respect to the collection of the necessary loan files is critical for the parties to achieve their shared goal of efficiently resolving the RMBS Claims on a timely schedule.

Additionally, Lehman urges the RMBS Trustees to avail themselves of the Court's assistance with respect to ensuring timely compliance with loan file requests from master and primary servicers. Considering both the Court's statements regarding its willingness to assist the parties in gathering loan files, as well as the RMBS Trustees' obligation to "promptly request that the Bankruptcy Court order the production of the files" (Protocol Order, RMBS Claims Protocol

Section I.c and I.e), Lehman considers such request of the Court to be both necessary and proper at this juncture. Lehman would certainly support an application by the RMBS Trustees requesting such an order from the Court.

I look forward to hearing from you at your earliest convenience.

Sincerely,

Jodd S. Cesenza 5/Cht Todd G. Cosenza